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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

**FARMER BROTHERS
COMPANY,**

Plaintiff,

v.

RICKY ALBRECHT,

Defendant.

Case No. 2:11-CV-1371-PMP-(CWH)

**DEFENDANT'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO THE COMPLAINT**

(Fourth Request)

Pursuant to Federal Rule of Civil Procedure 6(b)(1), Ricky Albrecht, by and through undersigned counsel, respectfully requests that the Court grant him an extension of time to respond to Farmer Brother's Company's ("FBC") Complaint to and until December 23, 2011. Presently, Defendant's response is due on November 30, 2011. This is Defendant's fourth request for an extension of time for the purpose set forth in this motion. FBC's counsel, Jeffrey D. Winchester, Esq., is in agreement that an additional extension of time is appropriate for the reasons set forth in this motion. In support of this motion, Defendant relies upon the memorandum of points and

authorities set forth below.

MEMORANDUM OF POINTS AND AUTHORITIES

Following the most recent status conference before the Court, held on November 2, 2011, the parties have been actively engaged in settlement discussions in the hopes of resolving this litigation. To that end, FBC counsel forwarded a draft proposal to undersigned counsel. After review, undersigned counsel provided FBC counsel with comments and counter-proposals. FBC counsel has advised that he is in the process of forwarding another draft proposal. In light of these facts, additional time is needed to permit the parties full opportunity to continue settlement discussions. Extending the time for Defendant's response to the Complaint will permit the parties time to continue efforts to resolve this case while at the same time conserving Defendant's legal costs. For this reason, FBC counsel is in agreement that an additional extension of time is appropriate in this matter.

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CONCLUSION

In light of the foregoing, Defendant, by and through undersigned counsel, respectfully requests that the Court permit Defendant an extension of time, to and until December 23, 2011, to respond to the Complaint.

Respectfully submitted,

/s/ Paul S. Padda

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Dated: November 27, 2011

IT IS SO ORDERED:

Defendant's motion for extension of time to respond to the Complaint is hereby granted. Defendant shall file a response to the Complaint on or before December 23, 2011.



UNITED STATES MAGISTRATE JUDGE

Dated: November ²⁸, 2011